



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

INNA SHAPOVALOVA
Senior Counsel
Phone: (212) 356-2656
Fax: (212) 356-3509
Email: inshapov@law.nyc.gov

June 1, 2023

BY ECF

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: DeQuan Reyes v. City of New York, et al.
23 Civ. 01145 (LGS)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendants the City of New York and Mayor Eric Adams (“defendants”) in the above-referenced matter.¹ The undersigned writes to respectfully request a forty-five (45) day extension of time for this Office to respond to the Court’s April 4, 2023 Valentin Order, from June 5, 2023 to July 20, 2023. This is the first request of this kind. The undersigned was unable to contact plaintiff for his consent due to his current incarceration status.

By way of background, plaintiff who is proceeding *pro se* brings this action, pursuant to 42 U.S.C. § 1983, alleging *inter alia*, retaliation, negligence, deliberate indifference to medical care, a First Amendment violation, and municipal liability claims arising from incidents on or about May 18, 2021 until on or about January 23, 2023. See ECF No. 7. In his Amended Complaint, plaintiff names the City of New York, Eric Adams, and thirty-eight (38) other individuals as defendants in this action. See id. On April 4, 2023, the Court ordered this Office to “to identify the John Doe defendants, including: (1) the John Doe Officer(s) described in the May 18, 2021 incident (ECF 2 at 9); (2) John Doe Officer(s) alleged to have fomented an inmate assault

¹ This case has been assigned to Assistant Corporation Counsel Esther Kim, who is awaiting admission to the New York Bar. Ms. Kim is handling this matter under my supervision and may be reached at (212) 356-2340 or eunkim@law.nyc.gov.

on Plaintiff on Oct. 10, 2022 (id. at 11); and (3) the John Doe Officer and John Doe Captain present during Plaintiff's medical clinic visit on or about October 13, 2022," as alleged in plaintiff's Complaint. See ECF No. 8.

The reason for the instant request is that this Office is still in the process of obtaining pertinent documents from the Department of Correction regarding plaintiff's allegations in connection to the numerous incidents described in plaintiff's 225 page Complaint. The requested extension should allow time for this Office to obtain and review relevant documents concerning the May 18, 2021, October 10, 2022 and October 13, 2022 incidents described in the Complaint, which are necessary for this Office to respond to the Court's Valentin Order and investigate the allegations so that we can provide plaintiff with the proper identifies of the individuals he seeks to sue and proceed with this action.

Accordingly, this Office respectfully requests a forty-five (45) day extension of time to respond to the Court's April 4, 2023 Valentin Order, from June 5, 2023 to July 20, 2023.

Thank you for your consideration herein.

Respectfully submitted,

Inna Shapovalova

Inna Shapovalova
Senior Counsel
Special Federal Litigation Division

cc: **BY FIRST-CLASS MAIL**
DeQuan Reyes
Plaintiff pro se
4411-804-847
Rikers Island: G.R.V.C.
09-09 Hazen Street
East Elmhurst, NY 11370